



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7**

11201 Renner Boulevard  
Lenexa, Kansas 66219

APR 20 2018

**MEMORANDUM**

**SUBJECT:** Former Electrolux, Inc. Facility Field Sampling Investigation Sampling and Analysis Plan and QAPP Addendum; Jefferson, Iowa – Approved with Condition

**FROM:** *Diane Harris*  
Diane Harris, Regional Quality Assurance Manager  
Environmental Sciences and Technology Division

**TO:** Brian Mitchell, Task Order Contracting Officer Representative  
Waste Remediation and Permitting Branch  
Air and Waste Management Division

The review of the subject document prepared by Toeroek Associates, Inc. and dated March 14, 2018 has been completed according to the "EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations," EPA QA/R-5 March 2001. The document is a site-specific addendum to the previously approved REPA Programmatic QAPP (R7QAO Document Number: 2013218).

Based on the comments below, the document is approved with conditions. The document was found to be incomplete in addressing some key areas to the extent of potentially jeopardizing the quality of the data. These areas are fully described in this review memorandum as critical comments and can be adequately addressed by incorporation into the document but without resubmission. The document would not be approved without addressing these issues. General comments identify opportunities for strengthening the document but do not affect approval.

**Critical Comments**

1. § 4.0 Sampling Requirements, page 6 in SAP. The SAP states two groundwater samples will be collected from each well. However, Appendix C (§ 1.4 and Table 2) specifies only one groundwater sample from each well. Which is correct? The number of groundwater samples to be collected from each well needs to be verified and the SAP and/or Appendix C updated accordingly.
2. § 4.8 Decontamination, page 12 in SAP. This section describes decontamination and states that the Toerek team will decontaminate non-disposable field equipment. Section 2.5.1 in the REPA Programmatic QAPP includes the collection of equipment rinsate blanks when non-disposable sampling equipment is used. The SAP and Appendix C does not include the collection of equipment rinsate blanks and it is not clear if this is an oversight or if it has been determined that such blanks are not applicable to or appropriate for this project.

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### **General Comments**

3. § 4.0 Sampling Requirements, page 6 in SAP. If SOP 2341.01 “R7 Geospatial Data Deliverables” applies to the determination of the GPS coordinates, it should be referenced here.
4. § 1.7 Documentation and Records, page 3 in Appendix C. Please note the current version of SOP 2420.05 is 2420.05E. It is recommended the letter suffix be omitted when referencing R7 SOPs. It will be assumed the most current version will be followed.
5. Status of REPA Programmatic QAPP. The REPA Programmatic QAPP was initially approved in 2013 and QAPPs are valid for up to five years. Please note the REPA Programmatic QAPP will expire in 2018 and if it will continue to be used, it will need to be updated as necessary and submitted for re-approval.

If you have any questions, please contact me at x7258.

R7QAO Document Number: 2018086